

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Competitive Product Prices  
Inbound Parcel Post (at UPU Rates)

Docket No. CP2022-66

PUBLIC REPRESENTATIVE COMMENTS ON  
POSTAL SERVICE NOTICE OF FILING CHANGES  
IN RATES NOT OF GENERAL APPLICABILITY FOR  
INBOUND PARCEL POST (AT UPU RATES)

(June 1, 2022)

The Public Representative hereby provides comments pursuant to Order No. 6184.<sup>1</sup> In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a Change in Rates not of general applicability for the Inbound Parcel Post (at UPU Rates) product.<sup>2</sup> These rates are intended to take effect July 1, 2022. *Notice* at 2

Included as Attachment 1 to the Notice is an application for non-public treatment of materials filed under seal. The Postal Service also filed as Attachment 2, a redacted copy of Governors' Decision No. 19-1. Attachment 3 is a redacted version of UPU International Bureau (IB) Circular No. 49 (dated March 28, 2022) that contains the new

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<sup>1</sup> Order No. 6184, Notice and Order Concerning Changes in Prices for Inbound Parcel Post (at UPU Rates), May 25, 2022.

<sup>2</sup> Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability for Inbound Parcel Post (at UPU Rates), and Application for Non-Public Treatment, May 23, 2022. (Notice).

provisional prices.<sup>3</sup> Additionally, the Postal Service included the following: a certification pursuant to 39 C.F.R. § 3015.5(c)(2) as Attachment 4, the redacted Postal Service data transmitted to the UPU to justify its bonus payments as Attachment 5, a redacted excerpt from UPU IB Circular No. 92 (dated July 6, 2020) is also included as Attachment 6. A redacted Excel version of the supporting financial documentation is also included in the filing. *Notice* at 2-3.

## COMMENTS

Pursuant to 39 U.S.C. §3633(a), the Postal Service's prices must not result in the subsidization of competitive products by market dominant products; ensure that each competitive product will cover its attributable costs; and ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service.

Based on a review of the financial data, the prices for the Inbound Parcel Post (at UPU Rates) product should generate sufficient revenues to cover costs and therefore meet the requirements of 39 U.S.C. §3633(a).

## CONCLUSION

The Public Representative finds the proposed rates for Inbound Parcel Post (at UPU Rates) are in compliance with the requirements of 39 U.S.C. §3633(a). Thus, the Public Representative recommends that the Commission approve the proposed rates for Inbound Parcel Post (at UPU Rates).

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<sup>3</sup> The Postal Service explains that these prices are provisional because it expects the Postal Operations Council (POC) to issue revised rates in a re-issued circular during June 2022. *Notice* at 3-4. The Postal Service does not anticipate the revised rates to differ from the rates submitted with the Notice. *Id.* at 4.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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